

# EXHIBIT A

**State Court****Case Summary****Case No. 21EV003462**

<b>DOROTHEA CORNELIUS NKA</b>	§	Location: <b>State Court</b>
<b>DOROTHEA MUHAMMAD AND ALI S.</b>	§	Judicial Officer: <b>Dixon, Myra H</b>
<b>MUHAMMAD VS PHH MORTGAGE AND</b>	§	Filed on: <b>06/08/2021</b>
<b>NEW REZ SERVICES, ROBERT CONLEY</b>	§	SB176 Case Cross <b>0602021041952</b>
<b>AND EXPERIAN</b>		Reference Number:
	§	FSX case association <b>CAS-</b>
		number: <b>9D762311241E14BF27A1</b>

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**Case Information**


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Case Type: TORT  
Case Status: **06/08/2021 Open**

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**Assignment Information**


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**Current Case Assignment**

Case Number 21EV003462  
Court State Court  
Date Assigned 06/08/2021  
Judicial Officer Dixon, Myra H

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**Party Information**


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**Plaintiff DOROTHEA CORNELIUS NKA DOROTHEA MUHAMMAD**  
**MUHAMMAD, ALI**

**Defendant CONLEY, ROBERT**  
**EXPERIAN**  
**PHH MORTGAGE AND NEW REZ SERVICES**

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**Case Events**


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06/08/2021		COMPLAINT
06/08/2021		Summons
06/08/2021		Summons
06/08/2021		Summons
06/30/2021		Discovery
08/11/2021		Motion (OBTS)
08/11/2021		Proposed Order
08/16/2021		AFFIDAVIT
08/18/2021		AFFIDAVIT
08/27/2021		AFFIDAVIT

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### Financial Information

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**Plaintiff** DOROTHEA CORNELIUS NKA DOROTHEA MUHAMMAD

Total Financial Assessment	230.00
Total Payments and Credits	264.00
<b>Balance Due as of 9/2/2021</b>	<b>(34.00)</b>

**IN THE STATE COURT OF FULTON COUNTY**

**STATE OF GEORGIA**

**Civil Action File No.:**

DOROTHEA CORNELIUS,  
N/K/A DOROTHEA MUHAMMAD and  
ALI S. MUHAMMAD,

Plaintiffs,

Vs.

**JURY TRIAL DEMANDED**

PHH MORTGAGE SERVICES/NEW REZ;  
ROBERT CONLEY, and EXPERIAN,

Defendants.

**COMPLAINT**

COME NOW the Plaintiffs, DOROTHEA CORNELIUS now known as DOROTHEA MUHAMMAD and ALI S MUHAMMAD, by and through their undersigned attorney, and sues Defendants PHH MORTGAGE SERVICES/NEW REZ ROBERT CONLEY and Experian, individually, and as grounds therefore state as follows:

1.

This is an action for money damages for statutory and punitive damages for Defendants' violations of the Fair Debt Collection Practices Act (FDCPA) and the Fair Credit Reporting Act (FCRA), and for Defendant's ongoing and continuing bad faith failure to service Plaintiff's mortgage account pursuant to law, Defendants continuing failure and refusal to properly credit Plaintiffs account for payments received, and for false reporting of Plaintiffs mortgage account to the Credit Reporting Agencies.

**JURISDICTION AND VENUE**

2.

This court has jurisdiction over the parties and the subject matter of this case pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. Sections 1692-1692(p) and The Fair Credit Reporting Act, 15 U.S.C. Sections 1681-1682.

3.

Plaintiff, ALI S. MUHAMMAD (hereinafter referred to as MUHAMMAD) is a natural person over the age of eighteen, and a resident and citizen of Fulton County, Georgia, and is a "consumer" within the meaning of the FDCPA and FCRA. Plaintiff ALI S. MUHAMMAD entered into a written settlement agreement with Defendants in 2020. Attached hereto and made a part hereof is said settlement agreement as Plaintiffs Exhibit "A", is a copy of the Confidential Settlement and Release Agreement between the parties said agreement called for a 15 day notice to defendants see notice attached as exhibit "B"

4.

Plaintiff DOROTHEA CORNELIUS now known as DOROTHEA MUHAMMAD is a natural person over the age of eighteen, and a resident and citizen of Fulton County, Georgia, and is a "consumer" within the meaning of the FDCPA and FCRA.

5.

Defendants PHH Mortgage Services and New Rez, are entities and citizens of New Jersey and may be served at their offices in Mount Laurel, New Jersey Defendant Robert Conley is a natural person over the age of eighteen and can be served at his office in Mount Laurel, New Jersey both parties can be served at 1Mortgage Way Mt. Laurel, NJ 08054.

6.

Defendant Experian may be served at its office at 475 Anton Blvd., Costa Mesa CA 92626.

7.

There is complete diversity of citizenship between Plaintiffs and Defendants.

8.

All acts complained of occurred in Fulton County, Georgia.

9.

Plaintiffs and Defendants entered into a settlement Agreement wherein the parties agreed that Plaintiffs would bring their mortgage account with Defendants current by the end of 2020. In furtherance of said agreement, Plaintiff's sent a letter along with a check for \$3,788.16 dated December 31, 2020, which brought Plaintiffs mortgage account with Defendants current on their account by the end of 2020 as per their written agreement. Attached hereto and made a part hereof as Plaintiff's Exhibit "C" is a copy of the check.

10.

Subsequent to said settlement agreement, Plaintiffs received its first mortgage statement dated April 1, 2021 and paid PHH a total of \$2709.24, in excess of \$2,525.44, due see Exhibit "D" copy of cancelled check dated April 14, 2021 and copy of PHH Mortgage statement as exhibit "D".

11.

Plaintiffs paid the attached mortgage statement dated, May 1, 2021, Shown as owing a total of \$3,368.75 never giving Plaintiffs credit for the April payment of \$2709.24, and again stating an amount not due PHH, thus erroneously providing errant information of May payment to PHH in the amount of \$631.36 as exhibit "E".

12.

Plaintiffs again provide exhibit "F" as further proof of the continuous bad behavior of defendants as the June 1, 2021, mortgage statement does not credit the May 1, 2021, payment of \$631.36, and show the plaintiffs owing \$1305.87

13.

Notwithstanding the payments made and brought current by Plaintiffs, Defendants continue to falsely report Plaintiffs account as delinquent to the credit bureaus. Attached hereto and made a part hereof is a copy of Dispute Results from Experian Credit Bureau listing the account as \$1,920.00 past due as of April, 2021, as Plaintiffs' Exhibit "G". Defendants continue to falsely report Plaintiffs account.

14.

**COUNT 1— VIOLATION OF FDCPA AND FCRA FOR JANUARY 2021 PAYMENT**

Plaintiffs reallege the allegations of paragraphs 1 through 11 and incorporate same by reference into this Count. Plaintiffs seek statutory damages of \$1,000 per violation of the FDCPA and \$1,000. per violation of the FCRA for Defendants ongoing and continuing violations of the FDCPA and FCRA for the January, 2021 payment paid by Plaintiffs for a total of \$2,000, statutory damages per each Count as set forth below in Counts1 through Count VI herein, plus court costs and attorney's fees as set forth in Count VII.

15.

**COUNT 11—VIOLATION OF FDCPA AND FCRA FOR FEBAUARY, 2021 PAYMENT**

Plaintiffs reallege the allegations of paragraphs 1 through 11 and incorporate same by reference into this Count. Plaintiffs seek statutory damages of \$1,000 per violation of the FDCPA and \$1,000.00, per violation of the FCRA for Defendants ongoing and continuing violations of the FDCPA and FCRA for the January, 2021

payment paid by Plaintiffs for a total of \$2,000.00, statutory damages per each Count as set forth below in Counts1 through Count VI herein, plus court costs and attorney's fees as set forth in Count VII.

**COUNT III—VIOLATION OF FDCPA AND FCRA FOR MARCH, 2021  
PAYMENT**

Plaintiffs reallege the allegations of paragraphs 1 through 11 and incorporate same by reference into this Count. Plaintiffs seek statutory damages of \$1,000 per violation of the FDCPA and \$1,000. 00, per violation of the FCRA for Defendants ongoing and continuing violations of the FDCPA and FCRA for the January, 2021 payment paid by Plaintiffs for a total of \$2,000.00, statutory damages per each Count as set forth below in Counts1 through Count VI herein, plus court costs and attorney's fees as set forth in Count VII.

16.

**COUNT IV—VIOLATION OF FDCPA AND FCRA FOR APRIL, 2021  
PAYMENT**

Plaintiffs reallege the allegations of paragraphs 1 through 11 and incorporate same by reference into this Count. Plaintiffs seek statutory damages of \$1,000 per violation of the FDCPA and \$1,000. 00, per violation of the FCRA for Defendants ongoing and continuing violations of the FDCPA and FCRA for the January, 2021 payment paid by Plaintiffs for a total of \$2,000. 00, statutory damages per each Count as set forth below in Counts1 through Count VI herein, plus court costs and attorney's fees as set forth in Count VII.

17.

**COUNT V—VIOLATION OF FDCPA AND FCRA FOR MAY, 2021  
PAYMENT**



**CONFIDENTIAL SETTLEMENT AND RELEASE AGREEMENT**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

1. **Identify the main components of the system.** The system consists of a **client** and a **server**. The client is responsible for sending requests to the server and receiving responses. The server is responsible for processing requests and returning responses.

2. **Describe the data flow.** Data flows from the client to the server and back. The client sends requests to the server, and the server returns responses to the client.

3. **Explain the communication protocol.** The communication protocol is based on HTTP. The client sends requests to the server using the HTTP protocol, and the server returns responses to the client using the HTTP protocol.

4. **Discuss the security measures.** The system uses SSL/TLS encryption to secure communication between the client and the server. This ensures that data is transmitted securely and is not intercepted by unauthorized parties.

5. **Outline the deployment strategy.** The system is deployed on a cloud platform, such as AWS or Azure. This allows for scalability and high availability. The system is also monitored and maintained regularly to ensure optimal performance.

[REDACTED]

The following table shows the results of the regression analysis for the dependent variable "Perceived Effectiveness of the Intervention". The independent variables are "Age", "Gender", "Education", "Income", "Health Status", and "Social Support". The table includes the coefficient, standard error, t-statistic, and p-value for each variable.

Variable	Coefficient	Standard Error	t-statistic	p-value
Age	0.02	0.01	1.5	0.15
Gender	0.15	0.05	3.0	0.01
Education	0.05	0.02	2.5	0.02
Income	0.03	0.01	3.0	0.01
Health Status	0.10	0.03	3.0	0.01
Social Support	0.08	0.02	4.0	0.00

[illegible][illegible]

3. [REDACTED]

4. [REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Figure 1 consists of two bar charts. The left chart, titled 'Very concerned', shows the percentage of respondents who are very concerned about the environment by age group. The right chart, titled 'Somewhat concerned', shows the percentage of respondents who are somewhat concerned about the environment by age group. Both charts have a y-axis representing the percentage of respondents, ranging from 0 to 100. The x-axis for both charts lists age groups: 18-24, 25-34, 35-44, 45-54, 55-64, 65-74, and 75+.

Age Group	Very concerned (%)	Somewhat concerned (%)
18-24	~10	~10
25-34	~25	~25
35-44	~45	~45
45-54	~10	~10
55-64	~5	~5
65-74	~5	~5
75+	~5	~5

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Ali S. Muhammad  
Dorothea Muhammad  
1750 County Line Rd SW  
Atlanta, Georgia 30331

May 17, 2021

VIA: Certified Mail

Mark Windham, Esq.  
Troutman Pepper Hamilton Sanders, LLP  
Bank of America Plaza  
600 Peachtree Street, NE  
Suite 5200  
Atlanta, GA 30308-2216

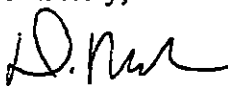
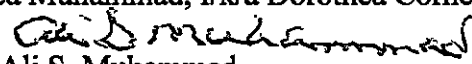
Re: Confidential Settlement and Release Agreement

Dear Mr. Windham:

Per paragraph 5, of the referenced agreement, notice is given that if PHH Mortgage Services does not change it's rating with regard to the credit file of Dorothea Cornelius, n/k/a Dorothea Muhammad, a law suit will be filed with said confidentiality agreement attached.

Per the required notice your client has 15 days to make the change.

Sincerely,

  
Dorothea Muhammad, f/k/a Dorothea Cornelius  
  
Ali S. Muhammad

Cc: Robert Conley/PHH Mortgage Services/Via Certified Mail

EXHIBIT "B"

ASM Holdings 64 LLC  
1851 Peachtree Rd NW  
Atlanta, GA 30314-1915

MORTGAGE PAYMENT 11447 VINEA LN. HAMPTON, GA.  
JULY, AUG. SEPT. OCT. NOV. DEC. 2020

1423  
64-131/511

DATE 12/31/20

PAY  
TO THE  
ORDER OF

PHH MORTGAGE CORP.

\$ 3,788.16

Thirty seven hundred eighty eight dollars 16/c

DOLLARS

Regions Bank  
Village Square  
1550 Cumberland Pkwy SE  
Atlanta, GA 30309

FOR

5908

*Ali Muhammad*

⑈001423⑈ ⑈061101375⑈ ⑈117⑈

ENDORSE FOR DEPOSIT ONLY

PHH Corporation

PHH Corporation

8669707

☐ CHECK ONLY FOR MOBILE DEPOSIT

APPROPRIATE FOR MOBILE DEPOSIT USE ONLY

Security Features: Watch for all details and details  
Watermark: 100% cotton paper and security features  
Microprint: Microprint around the perimeter of the front and back of the check  
Color: The color of the check is green and blue  
Security: The security features of the check are as follows:  
- The watermark is visible when held up to the light.  
- The microprint is visible around the perimeter of the front and back of the check.  
- The color of the check is green and blue.  
- The security features of the check are as follows:

Do not remove the security features of the check.  
If you remove the security features of the check, the check may be considered counterfeit.  
If you remove the security features of the check, the check may be considered counterfeit.  
If you remove the security features of the check, the check may be considered counterfeit.

EXHIBIT "C"

ACCOUNT 5908

**A S M Holdings 64 LLC**  
1851 Penslope Rd NW  
Atlanta, GA 30314-1915

1562  
64-137/611

DATE 4/14/2021

PAY TO THE ORDER OF **PHH MORTGAGE SERVICES** \$ 2,709.24

twenty seven hundred nine dollars and 24/100

DOLLARS

Regions Bank  
Vingco Smyrna  
1650 Cumberland Pkwy SE  
Smyrna, GA 30080

FOR *Awad Muhammad*

⑈001562⑈ ⑆061101375⑆ ⑈117⑈

Security Features exceed industry standards and include:

- ImageMatch®: Matching account and check number on back (Pat. No. 9,746,389)
- MobileMark®: Mobile Deposit check mark to indicate check has been deposited via mobile device
- The Security Wave® pattern on back designed to deter fraud
- Microprint (MP) lines printed on front and back
- The words "ORIGINAL DOCUMENT" across the back
- Photo Safe Deposit® icon visible on front and back

**Do not cash it:**

- Any of the features listed above are missing or appear altered
- Faintive ink on back looks pink or has disappeared
- Any staining or colored spots appear on both front and back
- and in Chemical Wash Detection Box

☐ CHECK BOX FOR MOBILE REMOTE DEPOSIT  
WRITE For Deposit Only  
PHH Corporation  
8803707

ALINK ACCOUNT

EXHIBIT"D"



PHH Mortgage Services  
P.O. Box 5452  
Mt. Laurel, NJ 08054-5452

## Your monthly mortgage statement

To obtain information about your account:  
Visit: [www.MortgageQuestions.com](http://www.MortgageQuestions.com)  
Call toll free: 1-888-820-6474  
Email us: [CustomerCare@mortgagefamily.com](mailto:CustomerCare@mortgagefamily.com)  
Fax: 1-856-917-8300



0006668 02 AS 0.425 \*\*AUTO T2 0 3353 30331-681850 -005-P010014 5 RE NZ1

DOROTHEA CORNELIUS

1750 COUNTY LINE RD SW  
ATLANTA, GA 30331-6819

Statement Date: 3/16/2021

Account Information	
Property Address	11447 VINEA LN HAMPTON, GA 30228 6259
Outstanding Balance (not payoff amount)	\$98,567.33
Principal Balance (interest bearing)	\$69,916.90
Deferred Balance (non-interest bearing)	\$28,640.43
Current Interest Rate	3.2800%
Prepayment Penalty	No
Escrow Balance	\$2,335.30
Suspense Balance	\$0.00

Past Payments Breakdown		
	Paid Since Last Statement	Paid Year to Date
Principal	\$356.74	\$356.74
Interest	\$11,641.68	\$11,641.68
Escrow (Taxes and/or Insurance)	\$12,970.89	\$12,970.89
Fees	\$318.30	\$318.30
Optional Products	\$0.00	\$0.00
Partial Payment (Unapplied)*	\$0.00	\$0.00
Total	\$25,287.61	\$25,287.61

## Transaction Activity

Date	Description	Principal (\$)	Interest (\$)	Escrow (\$)	Late Charges, Shortages & Fees (\$)	Suspense & Other (\$)	Optional Products (\$)	Total (\$)
01/05	Assessed Expense - INSPECTION FEE	\$0.00	\$0.00	\$0.00	\$0.00	\$15.00	\$0.00	\$0.00
01/08	Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$3,788.16	\$0.00	\$3,788.16
01/20	Non Cash Adjustment	\$5,106.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
01/20	Non Cash Adjustment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
01/20	Non Cash Adjustment	-\$28,640.43	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
01/20	Escrow Deposit	\$0.00	\$1,144.30	\$0.00	\$0.00	-\$1,144.30	\$0.00	\$0.00
01/20	Escrow Deposit	\$0.00	\$9,538.92	\$9,999.99	\$318.30	\$0.00	\$0.00	\$19,857.21
01/20	Assessed Expense - CAPPED MOD EXPEN Paid	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
01/20	Escrow Deposit	\$0.00	\$0.00	\$1,129.30	\$999.99	\$0.00	\$0.00	\$2,129.29
01/20	Assessed Expense - CAPPED MOD EXPEN Paid	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
01/20	Escrow Deposit	\$0.00	\$0.00	\$0.00	\$999.99	\$0.00	\$0.00	\$999.99
01/20	Assessed Expense - CAPPED MOD EXPEN Paid	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
01/20	Escrow Deposit	\$0.00	\$0.00	\$0.00	\$458.28	\$0.00	\$0.00	\$458.28

Page 1 of 1

Complete this coupon; tear it off and return it with your check. Please write your loan number on your check and make it payable to PHH Mortgage Services.

Loan number: 5908  
DOROTHEA CORNELIUS

PHH Mortgage Services  
PO Box 94087  
PALATINE, IL 60094-4087

Payment Due Date: 4/1/2021  
Regular Monthly Payment: \$631.38  
Total New Fees and Charges: \$26.30  
Outstanding Unpaid Late Charges, Returned Item Charges, Shortages and Other Fees: \$0.00  
Assessed Expenses: \$157.50  
Past Due Payments: \$1,894.08  
Total Amount Due: \$2,709.24

If you're paying more than the amount due, please tell us where you want us to apply the extra amount. If we do not receive your instructions, we'll apply the extra amount first to unpaid late charges and then to principal.

Extra principal: \$  
Extra escrow: \$  
Unpaid late charges: \$  
Other (specify): \$  
Total check enclosed: \$

99 954 7141495908 0000064451 0000063136 5

EXHIBIT"D"



PHH Mortgage Services  
P.O. Box 5452  
Mt. Laurel, NJ 08054-5452

## Your monthly mortgage statement

To obtain information about your account:  
Visit: [www.MortgageQuestions.com](http://www.MortgageQuestions.com)  
Call toll free: 1-888-820-6474  
Email us: [CustomerCare@mortgagefamily.com](mailto:CustomerCare@mortgagefamily.com)  
Fax: 1-856-917-8300



0016259 02 AG 0.425 \*\*AUTO TS 0 3376 30331-681950 -C05-P0208942 5 NFRE NZ1



DOROTHEA CORNELIUS

1750 COUNTY LINE RD SW  
ATLANTA, GA 30331-6819

Statement Date: 4/16/2021

Account Information	
Property Address	11447 VINEA LN HAMPTON, GA 30226 6259
Outstanding Balance (not payoff amount)	\$96,557.33
Principal Balance (interest bearing)	\$69,916.90
Deferred Balance (non-interest bearing)	\$26,640.43
Current Interest Rate	3.2900%
Prepayment Penalty	No
Escrow Balance	\$2,335.30
Suspense Balance	\$0.00

Past Payments Breakdown		
	Paid Since Last Statement	Paid Year to Date
Principal	\$0.00	\$356.74
Interest	\$0.00	\$11,641.68
Escrow (Taxes and/or Insurance)	\$0.00	\$12,970.89
Fees	\$0.00	\$318.30
Optional Products	\$0.00	\$0.00
Partial Payment (Unapplied)*	\$0.00	\$0.00
Total	\$0.00	\$25,287.61

## Transaction Activity

Posted Date	Received/Description	Principal (\$)	Interest (\$)	Escrow (\$)	Late Charges, Shortages & Fees (\$)	Suspense & Other (\$)	Optional Products (\$)	Total (\$)
03/19	Assessed Expenses - INSPECTION FEE	\$0.00	\$0.00	\$0.00	\$0.00	\$15.00	\$0.00	\$0.00
04/16	Late Fee Accrued	\$0.00	\$0.00	\$0.00	-\$13.15	\$0.00	\$0.00	\$0.00

## Important Information

If it's not possible to make the monthly payment due to impacts from COVID-19, please notify us right away. You can notify us by filling out the COVID-19 Hardship Notification Form that is available on our website listed above. Click the "Learn More" link within the red Coronavirus banner for details. If you have other questions regarding COVID-19, you may also email or call us - please see the top of the billing statement for contact information. We appreciate your support in using the self-serve options as our wait times may be extended due to anticipated volume related to COVID-19.

Page 1 of 6

Complete this coupon; tear it off and return it with your check. Please write your loan number on your check and make it payable to PHH Mortgage Services.

Loan number: 5908  
DOROTHEA CORNELIUS

Payment Due Date	5/1/2021
Regular Monthly Payment	\$631.35
Total New Fees and Charges	\$13.15
Outstanding Unpaid Late Charges, Returned Item Charges, Shortages and Other Fees	\$26.30
Assessed Expenses	\$172.50
Past Due Payments	\$2,525.44
Total Amount Due	\$3,368.75

If you're paying more than the amount due, please tell us where you want us to apply the extra amount. If we do not receive your instructions, we'll apply the extra amount first to unpaid late charges and then to principal.

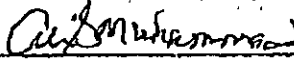
Extra principal	\$
Extra escrow	\$
Unpaid late charges	\$
Other (specify)	\$
Total check enclosed	\$

PHH Mortgage Services  
PO Box 94087  
PALATINE, IL 60094-4087



99 954 7141495908 0000064451 0000063136 5

EXHIBIT"E"

<b>A S M Holdings 64 LLC</b> 1851 Penelope Rd NW Atlanta, GA 30314-1915		ACCOUNT# <b>5908</b>	<b>1602</b> 64-137811
		DATE <b>5/5/2021</b>	
PAY TO THE ORDER OF	<b>PHH MORTGAGE CORP</b>		\$ <b>631.36</b>
six hundred thirty one dollars and 36/¢			DOLLARS
Regions Bank Vining Smyrna 1660 Cumberland Pkwy SE Smyrna, GA 30080			
FOR _____			
⑈001602⑈ ⑆061101375⑆ ⑈ ⑈0117⑈			

☐ ⑆061101375⑆  
☐ ⑆0117⑆  
 A S M Holdings 64 LLC

Security Features exceed industry standards and include:

- ImageMatch™: Matching account and check number on back (Patented, U.S. Pat. 6,233,028)
- MobileMark™: Mobile Deposit check mark to indicate check has been deposited via mobile device
- The Security Weave™: pattern on back designed to deter fraud
- Microprint (MP) lines printed on front and back
- The words "ORIGINAL DOCUMENT" across the back
- Photo Safe Deposit™ icon visible on front and back

Do not cash if:

- Any of the features listed above are missing or appear altered
- Fugitive Ink on back looks pink or has disappeared
- Brown stains or colored spots appear on both front and back, and in Chemical Wash Detection Box

☒ CHECK BOX FOR MOBILE/REMOTE DEPOSIT  
 WRITE  
 For Deposit Only  
 PHH Corporation  
 6608707

ONLINE ABOVE

EXHIBIT"E"

## Your monthly mortgage statement

To obtain information about your account:  
Visit: [www.MortgageQuestions.com](http://www.MortgageQuestions.com)  
Call toll free: 1-888-820-6474  
Email us: [CustomerCare@mortgagefamily.com](mailto:CustomerCare@mortgagefamily.com)  
Fax: 1-856-917-8300

0035857 01 AB 0.425 \*\*AUTO T1 2 3389 30331-691850 -C05-P06422-1 2 5 NFRE NZ1



DOROTHEA CORNELIUS

1750 COUNTY LINE RD SW  
ATLANTA, GA 30331-6819

Loan number: 5908  
Payment Due Date: 6/1/2021

**Amount Due: \$1,305.87**

If payment is received after 6/16/2021, a \$13.15 late fee may be charged.

Statement Date: 5/5/2021

Account Information	
Property Address	11447 VINEA LN HAMPTON, GA 30228 6259
Outstanding Balance (not payoff amount)	\$98,255.26
Principal Balance (interest bearing)	\$59,614.83
Deferred Balance (non-interest bearing)	\$28,640.43
Current Interest Rate	3.2800%
Prepayment Penalty	No
Escrow Balance	\$662.02
Suspense Balance	\$0.00

Explanation of Amount Due	
Principal	\$72.06
Interest	\$190.08
Escrow (Taxes and/or Insurance)	\$368.32
Optional Products/Other	\$0.00
Regular Monthly Payment	\$631.36
Total New Fees and Charges	\$13.15
Outstanding Unpaid Late Charges, Returned Item Charges, Shortages and Other Fees	\$13.15
Assessed Expenses	\$43.15
Past Due Payment(s)	\$631.36
Total Amount Due	\$1,305.87

Past Payments Breakdown		
	Paid Since Last Statement	Paid Year to Date
Principal	\$302.07	\$658.81
Interest	\$763.24	\$12,404.92
Escrow (Taxes and/or Insurance)	\$1,473.28	\$14,444.17
Fees	\$26.30	\$344.60
Optional Products	\$0.00	\$0.00
Partial Payment (Unapplied)*	\$0.00	\$0.00
Total	\$2,564.89	\$27,852.50

Important Messages	
You are currently due for the 5-1-2021 payment. Your last full payment was applied to the payment due 4-1-2021.	
*Partial Payments: Any partial payments that you make are not applied to your mortgage, but instead are held in a separate suspense account. If you pay the balance of a partial payment, the funds will then be applied to your mortgage.	
Please note that this is not the payoff quote and any amount less than the payoff quote will be returned. Please contact us for payoff quote.	

Transaction Activity		Principal (\$)	Interest (\$)	Escrow (\$)	Late Charges, Shortages & Fees (\$)	Suspense & Other (\$)	Optional Products (\$)	Total (\$)
Posted Date	Received/Description							
04/21	04/16 Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$1,894.07	\$0.00	\$1,894.07
04/21	04/16 Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$815.17	\$0.00	\$815.17
04/22	04/16 Payment	\$71.93	\$191.11	\$368.32	\$0.00	-\$2,525.44	\$0.00	\$0.00
04/22	04/22 Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
04/22	04/16 Payment	\$72.13	\$190.91	\$368.29	\$0.00	\$0.00	\$0.00	\$0.00
04/22	04/22 Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
04/22	04/16 Payment	\$72.33	\$190.71	\$368.32	\$0.00	\$0.00	\$0.00	\$0.00
04/22	04/22 Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
04/22	04/16 Payment	\$72.53	\$190.51	\$368.32	\$0.00	\$0.00	\$0.00	\$0.00
04/22	04/22 Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
04/22	Fee Reversal	\$0.00	\$0.00	\$0.00	\$13.15	\$0.00	\$0.00	\$0.00
04/22	04/16 Payment	\$0.00	\$0.00	\$0.00	\$26.30	-\$13.15	\$0.00	\$0.00
04/22	04/16 Extra Principal	\$13.15	\$0.00	\$0.00	\$0.00	-\$13.15	\$0.00	\$0.00

Page 1 of 4

Complete this coupon; tear it off and return it with your check. Please write your loan number on your check and make it payable to PHH Mortgage Services.

Loan number: 5908  
DOROTHEA CORNELIUS

Payment Due Date	6/1/2021
Regular Monthly Payment	\$631.36
Total New Fees and Charges	\$13.15
Outstanding Unpaid Late Charges, Returned Item Charges, Shortages and Other Fees	\$13.15
Assessed Expenses	\$43.15
Past Due Payments	\$631.36
Total Amount Due	\$1,305.87

PHH Mortgage Services  
PO Box 94087  
PALATINE, IL 60094-4087



If you're paying more than the current due, please let us know you want us to apply the extra amount. If we do not receive your instructions, we'll apply the extra amount first to unpaid late charges and then to principal.

Extra principal	\$
Extra escrow	\$
Unpaid late charges	\$
Other (specify)	\$
Total check enclosed	\$

99 954 7141495908 0000064451 0000063136 5

EXHIBIT "F"



PO Box 9701  
Allen, TX 75013



0001603 01 MB 0.447 \*\*AUTO T5 0 7103 30331-681950 -C01-P01604-I  
DOROTHEA MUHAMMAD  
1750 COUNTY LINE RD SW  
ATLANTA GA 30331-6819



## Your Dispute Results

Report # 0558-0244-21 for Apr 30, 2021

### Hi, Dorothea. Welcome to your Dispute Results.

Our reinvestigation of the dispute(s) and/or other request(s) you recently submitted is now complete. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the requested status at the time of our reinvestigation.

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We will process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record. If we were able to make changes to your credit report based on information you provided, or if you requested the addition of a statement, we have done so. Otherwise, we have contacted the company reporting the information you disputed, supplied them all relevant information and any documents you gave us with your dispute, and instructed them to: review all information we provide them about your dispute; verify the accuracy of the information; provide us a response to your dispute; and update their records and systems as necessary.

### How to Read Your Results

**Deleted** - This item was removed from your credit report. **Remains** - The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. **Updated** (Your results will indicate which one of the following applies.) – a) The information you disputed has been updated. Please review your report for the details. b) The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details. c) The information you disputed has been verified as accurate, however, information unrelated to your dispute has been updated. Please review your report for the details. d) Information on this item has been updated. Please review your report for the details. **Processed** - This item was either updated or deleted; Please review your report for the details.

### Here are your results

#### Credit items

PHH MORTGAGE SERVICES 954714149.... Outcome: Updated - The information you disputed has been verified as accurate; however, information unrelated to your dispute has been updated. Please review your report for the details.

EXHIBIT"G"

7103-01-00-0001603-0002-0003289

## Dispute Results (Continued)

## Before Dispute

**PHH MORTGAGES SERVICES Partial Acct #** [REDACTED] 149....  
 2001 LEADENHALL RD MT LAUREL NJ 08054; No phone # available

Status (Apr 2021) Open. Balloon payment of \$28,640 due Sep 2036. \$1,920 past due as of Apr 2021.

**Date opened** Aug 2006  
**Address ID #** 0492861040  
**Type** Mortgage  
**Responsibility** Individual

**Terms** 16 Years  
**Monthly payment** \$631  
**Credit limit or original amount** \$156,750  
**High balance** Not reported

**Recent balance** \$101,855 as of Apr 2021  
 By Nov 2022, this account is scheduled to go to a positive status.  
**Comment:** Loan Modified

## Payment history: Mar 2021 - Apr 2021

JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC  
 2021 (60) (60)

## Account History:

Mar21  
 Account Balance \$101,636  
 Date Payment Received 01.21.21  
 Scheduled Payment \$631  
 Actual Amount Paid No Data

## After Dispute

**PHH MORTGAGES SERVICES Partial Acct #** [REDACTED] 149....  
 2001 LEADENHALL RD MT LAUREL NJ 08054; No phone # available

Status (Apr 2021) Open. Balloon payment of \$28,640 due Sep 2036. \$1,920 past due as of Apr 2021.

**Date opened** Aug 2006  
**Address ID #** 0492861040  
**Type** Mortgage  
**Responsibility** Individual

**Terms** 16 Years  
**Monthly payment** \$631  
**Credit limit or original amount** \$156,750  
**High balance** Not reported

**Recent balance** \$101,855 as of Apr 2021  
 By Nov 2022, this account is scheduled to go to a positive status.  
**Comment:** Loan Modified  
 This item was updated from our processing of your dispute in Apr 2021.

## Payment history: Mar 2021 - Apr 2021

JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC  
 2021 (60) (60)

## Account History:

Mar21  
 Account Balance \$101,636  
 Date Payment Received 01.21.21  
 Scheduled Payment \$631  
 Actual Amount Paid No Data

If our reinvestigation has not resolved your dispute, you have several options:

You may add a statement of up to 100 words to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to Experian including this information in every credit report we issue about you. You may contact the company that reports the information to us and dispute it directly with them. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly. You may provide us additional information or documents about your dispute to help us resolve it by visiting [www.experian.com/upload](http://www.experian.com/upload). You may also mail your information to Experian, P.O. Box 9701, Allen, Texas 75013.

You may file a complaint about Experian or the company reporting the item, with the Consumer Financial Protection Bureau or your State Attorney General's office. If there has been a change to your credit history resulting from our reinvestigation, or if you add a consumer statement, you may request that Experian send an updated report to those who received your report within the last two years for employment purposes, or within the last six months for any other purpose (the past 12 months for residents of Colorado, Maryland or New York), or within the last year for any non-employment purpose under the California Investigative Consumer Reporting Agencies Act. If you send a request to have your results sent to past recipients of your credit report, please designate the organization's name and address. In the event an organization is not specifically designated, we will generally default to sending only to companies that have requested your credit information as a result of an action you took, such as applying for credit, insurance, employment or apartment rental. If you request to have your results sent to past recipients of your investigative consumer report, you have the right to designate which entities you wish to receive the updated report and which entities you do not wish to receive the update. If interested, you may also request a description of how the reinvestigation was conducted along with the business name, address and telephone number (if reasonably available) of the furnisher of information. For frequently asked questions about your credit report, please visit [experian.com/consumerfaqs](http://experian.com/consumerfaqs).

## Medical Information

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer Statements included on your report at your request that contain medical information are disclosed to others.

## Payment History Legend

<b>OK</b> Current / Terms met	<b>150</b> Past due 150 Days	<b>-VS-</b> Voluntarily surrendered	<b>D</b> Defaulted on contract
<b>30</b> Past due 30 Days	<b>180</b> Past due 180 Days	<b>R</b> Repossession	<b>C</b> Collection
<b>60</b> Past due 60 Days	<b>CRD</b> Creditor received deed	<b>PBC</b> Paid by creditor	<b>CO</b> Charge off
<b>90</b> Past due 90 Days	<b>FS</b> Foreclosure proceedings started	<b>EC</b> Insurance claim	<b>CLS</b> Closed
<b>120</b> Past due 120 Days	<b>F</b> Foreclosure	<b>G</b> Claim filed with government	<b>ND</b> No data for this period

EXHIBIT "G"

Plaintiffs reallege the allegations of paragraphs 1 through 11 and incorporate same by reference into this Count. Plaintiffs seek statutory damages of \$1,000 per violation of the FDCPA and \$1,000.00, per violation of the FCRA for Defendants ongoing and continuing violations of the FDCPA and FCRA for the January, 2021 payment paid by Plaintiffs for a total of \$2,000. 00, statutory damages per each Count as set forth below in Counts1 through Count VI herein, plus court costs and attorney's fees as set forth in Count VII.

18.

**COUNT VI—VIOLATION OF FDCPA AND FCRA FOR JUNE, 2021 PAYMENT**

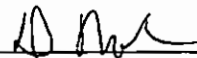
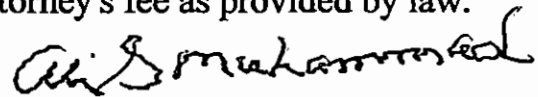
Plaintiffs reallege the allegations of paragraphs 1 through 11 and incorporate same by reference into this Count. Plaintiffs seek statutory damages of \$1,000.00, per violation of the FDCPA and \$1,000.00, per violation of the FCRA for Defendants ongoing and continuing violations of the FDCPA and FCRA for the January, 2021 payment paid by Plaintiffs for a total of \$2,000. statutory damages per each Count as set forth below in Counts1 through Count VI herein, plus court costs and attorney's fees as set forth in Count VII.

19.

**COUNT VII—PUNITIVE DAMAGES, COSTS AND ATTORNEY'S FEES**

Defendants continued and persistent violation of the law as set forth in paragraphs 1 through 19 above, entitles Plaintiffs to punitive damages of at least \$35,000.00, plus court costs and a reasonable attorney's fee as provided by law.

Dated this 8<sup>th</sup> day of June, 2021.



Ali S. Muhammad

Dorothea Muhammad

P.O. 92597  
Atlanta, GA 30314

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY

Civil Division

CIVIL ACTION FILE #:

File &amp; ServeXpress

Transaction ID: 66668756

Date: Jun 08 2021 04:46PM

Christopher G. Scott, Chief Clerk

Civil Division

Dorothea Cornelius NKA Dorothea  
Muhammad and Ali S. Muhammad

Plaintiff's Name, Address, City, State, Zip Code

vs.

PAH Mortgage and New Rez Services  
1 Mortgage Way  
Mt. Laurel, NJ 08054

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input checked="" type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: D. Muhammad and Ali MuhammadAddress: PO Box 92597City, State, Zip Code: Atlanta, GA 30314Phone No.: 404-664-1023

An answer to this complaint, which is herewith served upon you, must be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSES MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, -Atlanta, GA 30303.

Christopher G. Scott, Chief Clerk (electronic signature)

**SERVICE INFORMATION:**

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE **File & ServeXpress**

STATE COURT OF FULTON COUNTY

Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Transaction ID: 66668756

Date: Jun 08 2021 04:46PM

Christopher G. Scott, Chief Clerk

Civil Division

Dorothea Cornelius NKA Dorothea  
Muhammad and Ali S. Muhammad

Plaintiff's Name, Address, City, State, Zip Code

vs.

Experian29 Broadway 6th FlNew York, New York 10009

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input checked="" type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO.	_____

**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: D. Muhammad and Ali MuhammadAddress: PO Box 92597City, State, Zip Code: Atlanta, GA 30314Phone No.: 404-664-1023

An answer to this complaint, which is herewith served upon you, must be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSES MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.

Christopher G. Scott, Chief Clerk (electronic signature)

**SERVICE INFORMATION:**

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

File &amp; ServeXpress

Transaction ID: 66668756

Date: Jun 08 2021 04:46PM

Christopher G. Scott, Chief Clerk

Civil Division

## STATE COURT OF FULTON COUNTY

Civil Division

CIVIL ACTION FILE #:

Dorothea Cornelius NKA Dorothea  
Muhammad and Ali S. Muhammad

Plaintiff's Name, Address, City, State, Zip Code

vs.

Robert Conley  
1 Mortgage Way  
Mt. Laurel, NJ 08054

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input checked="" type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

## SUMMONS

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: D. Muhammad and Ali MuhammadAddress: PO Box 92597City, State, Zip Code: Atlanta, GA 30314Phone No.: 404-664-1023

An answer to this complaint, which is herewith served upon you, must be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSES MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.

Christopher G. Scott, Chief Clerk (electronic signature)

## SERVICE INFORMATION:

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)



**IN THE STATE COURT OF FULTON COUNTY**

DOROTHEA CORNELIUS  
N/K/A DOROTHEA MUHAMMAD and  
ALI S. MUHAMMAD, CASE NO. 21EV003462  
Plaintiffs,

vs.

PHH MORTGAGE SERVICES/NEW REZ;  
ROBERT CONLEY and EXPERIAN,  
Defendants

---

**PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS**

Plaintiffs Dorothea Muhammad and Ali S. Muhammad and submits the following Requests for Admissions to Defendants pursuant to the Applicable Rule of Civil Procedure Rule to admit the following:

**INSTRUCTIONS**

If Defendants fail to respond or object to any request within 30 days from Service of the Requests, the matter shall be deemed admitted under the Rule. As is more fully set forth in the rule, the Defendants shall admit or deny each request and where necessary specify the parts of each request to which it objects or cannot in good faith admit or deny. If the Defendant objects to any part of the request. In the event that the Defendant objects to or denies any request or portion of a request the Defendant must state the reasons for its objection or denial be required if you directly or indirectly obtain further information after your initial response as provided by the Rule. Each request solicits all information obtainable by Defendants from Defendants, their attorneys, investigators, agents, employees, and representatives. If you answer a request on the basis that you lack sufficient knowledge to respond, describe any and all efforts you made to inform yourself of the facts and circumstances necessary to answer or respond.

**DEFINITIONS**

- The word "or" is used herein in its inclusive sense unless the context

clearly requires otherwise.

- The term “document” means and includes without limitation all correspondence, memoranda, certificates, notes, books, pamphlets, brochures, advertisements, books of account, working papers, worksheets, bills, statements, receipts, forms, agreements, and all other records and papers of any nature whatsoever.

- Any reference to a specifically named person, corporation or any other entity and any reference generally to “person” shall include the employees, agents, representatives and other persons acting on behalf thereof or through whom the referenced person acts.

The term “person” means and includes natural persons, corporations, partnerships, limited liability companies, partnerships, joint ventures, sole proprietorships, associations, trusts, estates, firms and any other entities.

- As used herein “Plaintiff” means, unless otherwise indicated includes Dorothea Cornelius, now known as Dorothea Muhammad and Ali S. Muhammad. As used herein “Defendant” shall be deemed to include PHH Mortgage Services/ New Rez as well as Robert Conley and Experian.as their agents, attorneys, or any other person acting on their behalf or on behalf of any one of them.

### **FIRST SET OF ADMISSIONS**

First Request. Admit that Benjamin Verdwren signed the Confidential Settlement Agreement on January 14, 2021.

Second Request. Admit that Attorneys for U.S. Bank signed the Confidential Settlement Agreement on January 15, 2021.

Third Request. Admit that Plaintiffs signed the Confidential Settlement Agreement on December 5, 2020.

Fourth Request. Admit that PHH Mortgage Services/New Rez did not send Plaintiffs an invoice or statement in the month of January, 2021.

Fifth Request. Admit that PHH Mortgage Services/New Rez did not send Plaintiffs an invoice or statement for the month of February, 2021.

Sixth Request. Admit that PHH Mortgage Services/New Rez did not send Plaintiffs an invoice or statement for the month of March, 2021.

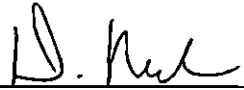
Seventh Request. Admit that PHH Mortgage Services/New Rez reported the Past Due information to Defendant Experian.

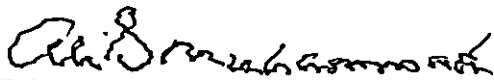


Eighth Request. Admit that Exhibits "A", "B", "C", "D", "E" "F" and "G" attached to the Complaint are true and correct copies of the original documents,

Respectfully submitted,

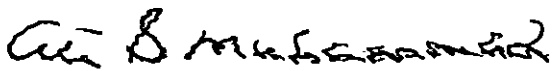
P.O. Box 92597  
Muhammad  
Atlanta, GA 30314

  
\_\_\_\_\_  
Dorothea Cornelius N/K/A Dorothea  
Plaintiff Pro Se

  
\_\_\_\_\_  
Ali S. Muhammad, Plaintiff Pro Se

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Admissions has been furnished to all counsel of record at their office addresses this 30th day of June, 2021.

  
\_\_\_\_\_  
Ali S. Muhammad, Plaintiff Pro Se

DOROTHEA CORNELIUS nka :  
DOROTHEA MUHAMMAD and :  
ALI S. MUHAMMAD :

**State Court of Fulton County**

**\*\*\*EFILED\*\*\***

**File & ServeXpress**

Transaction ID: 66840720

Case Number: 21EV003462

Date: Aug 11 2021 01:58PM

Christopher G. Scott, Chief Clerk

Civil Division

Plaintiff,

CIVIL ACTION

vs.

FILE NO.: 2021EV003462

PHH MORTGAGE SERVICES/NEW :  
REZ; ROBERT CONLEY; and :  
EXPERIAN :

Defendant.

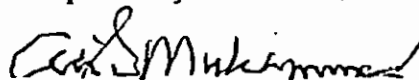
MOTION FOR APPOINTMENT OF SPECIAL AGENTS FOR SERVICE

COMES NOW, the Plaintiff in the above action moves that an Order be entered naming, ASAD SHAH and/or NANCY ZIERDT as Special Agents to serve the Defendants with a copy of the Summons and Pleadings in this action pursuant to O.C.G.A. 9-11-4(c). In support thereof, plaintiff shows that the Defendant must be served in Mt. Laurel, NJ which is outside the jurisdiction of this court. Said agents are not employees of this firm, nor are they parties in this action, and have no interest in the outcome of this case. Further, they are more than eighteen (18) years of age, and are citizens of the United States.

This 11th day of August, 2021.

Respectfully submitted,

Ali S. Muhammad



DOROTHEA CORNELIUS nka :  
DOROTHEA MUHAMMAD and :  
ALI S. MUHAMMAD :

Plaintiff, :

vs. :

PHH MORTGAGE SERVICES/NEW :  
REZ; ROBERT CONLEY; and :  
EXPERIAN :

\_\_\_\_\_  
Defendant. \_\_\_\_\_ :

CIVIL ACTION

FILE NO.: 2021EV003462

State Court of Fulton County

\*\*\*EFILED\*\*\*

File & ServeXpress

Transaction ID: 66840729

Case Number: 21EV003462

Date: Aug 11 2021 02:00PM

Christopher G. Scott, Chief Clerk

Civil Division

ORDER

The above Motion has been read and considered and the same appears to the Court that sufficient grounds exist for granting thereof, it is hereby ORDERED that Asad Shah and/or Nancy Zierdt citizens of the United States and over the age of 18, are hereby authorized and specially appointed by this Court to serve process and to personally serve the Defendants herein with a copy of the Summons and Pleadings filed in this action.

This \_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
JUDGE STATE COURT FULTON  
COUNTY, STATE OF GEORGIA

Ali S. Muhammad /s/  
1750 County Line Rd SW  
Atlanta GA 30331

## AFFIDAVIT OF SERVICE

Case: 21EV003462	Court: STATE COURT OF FULTON COUNTY	County: , GA	Job: 5963802
Plaintiff / Petitioner: Dorothea Cornelius, etc.		Defendant / Respondent: PHH Mortgage and New Rez Services, et al.	
Received by: Attorneys' Personal Services, Inc.		For: James Cornelius	
To be served upon: PHH Mortgage			

I, Bruce Smith, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: PHH Mortgage, 2 Sun Ct NW Ste 400, Norcross, GA 30092

Manner of Service: Registered Agent, Aug 3, 2021, 12:16 pm EDT

Documents: Summons and Complaint

## Additional Comments:

1) Successful Attempt: Aug 3, 2021, 12:16 pm EDT at 2 Sun Ct NW Ste 400, Norcross, GA 30092 received by PHH Mortgage. Age: 40's; Ethnicity: African American; Gender: Female; Weight: 160's; Height: 5'7"; Hair: Black;  
 I served Alisha smith of CSC

Subscribed and sworn to before me by the affiant who is personally known to me.

Bruce N Smith 8-10-21

Bruce Smith  
 050234515

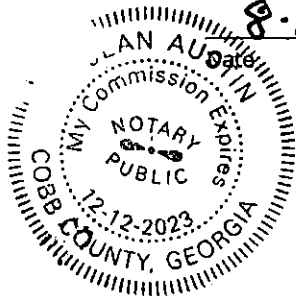
Date

Jean Austin  
 Notary Public

8-10-21  
 Date

Commission Expires

Attorneys' Personal Services, Inc.  
 400 Galleria Pkwy Suite 1500  
 Atlanta, GA 30339  
 770-366-1619



## AFFIDAVIT OF SERVICE

Case: 21EV003462	Court: STATE COURT OF FULTON COUNTY	County: , GA	Job: 5963802
Plaintiff / Petitioner: Dorothea Cornelius, etc.		Defendant / Respondent: PHH Mortgage and New Rez Services, et al.	
Received by: Attorneys' Personal Services, Inc.		For: James Cornelius	
To be served upon: PHH Mortgage			

I, Bruce Smith, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

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 I served Alisha Smith of CSC

Subscribed and sworn to before me by the affiant who is personally known to me.

Bruce R Smith 8-10-21

Bruce Smith  
 050234515

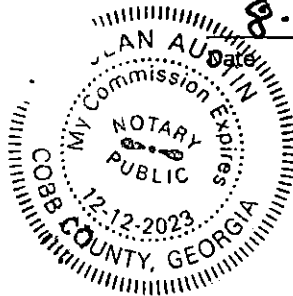
Date

Jean Austin  
 Notary Public

8-10-21

Commission Expires

Attorneys' Personal Services, Inc.  
 400 Galleria Pkwy Suite 1500  
 Atlanta, GA 30339  
 770-366-1619



## AFFIDAVIT OF SERVICE

Case: 21EV003462	Court: STATE COURT OF FULTON COUNTY	County: GA	Job: 5990194
Plaintiff / Petitioner: Dorothea Cornelius, etc.		Defendant / Respondent: PHH Mortgage and New Rez Services, et al.	
Received by: Attorneys' Personal Services, Inc.		For: James Cornelius	
To be served upon: Experian Information Solutions, Inc.			

I, Bruce Smith, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Experian Information Solutions, Inc., 289 S Culver St, Lawrenceville, GA 30046

Manner of Service: Registered Agent, Aug 16, 2021, 11:52 am EDT

Documents: Summons and Complaint

## Additional Comments:

1) Successful Attempt: Aug 16, 2021, 11:52 am EDT at 289 S Culver St, Lawrenceville, GA 30046 received by Experian Information Solutions, Inc.. Age: 69; Ethnicity: Caucasian; Gender: Female; Weight: 150; Height: 5'; Hair: Gray;  
 I served Linda Banks Process Specialist for C T Corporation Registered Agent.

Subscribed and sworn to before me by the affiant who is personally known to me.

Bruce Smith 8/20/21

Bruce Smith  
 050234515

Date

Jean Austin  
 Notary Public

8-20-21

Date

Commission Expires

Attorneys' Personal Services, Inc.  
 400 Galleria Pkwy Suite 1500  
 Atlanta, GA 30339  
 770-366-1619

